

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

DWAYNE HASKINS, SR., TAMARA	:	
HASKINS, TAMIA HASKINS, AND	:	
HASKINS FAMILY FOUNDATION INC.,	:	
	:	
Plaintiffs,	:	Civil Action No.: _____
	:	
v.	:	Electronically Filed
	:	
KALABRYA HASKINS,	:	
	:	
Defendant.	:	
	:	

DECLARATION OF TAMARA HASKINS

I, Tamara Haskins, am over the age of 18 years old and, upon personal knowledge, declares as follows:

BACKGROUND

1. I am the surviving mother of the deceased, former professional football player, Dwayne Haskins, Jr. (hereinafter, “Dwayne, Jr.”). Dwayne, Jr. played quarterback in the NFL for three seasons, including as a first round draft pick for the Washington Redskins from 2019-2020, and then for the Pittsburgh Steelers from 2021-2022.

2. Prior to being drafted into the NFL, Dwayne, Jr. was a standout quarterback for the Ohio State Buckeyes. While at Ohio State, Dwayne, Jr. claimed the single-season passing and touchdown records for the school and the Big Ten

conference by eclipsing the 4,000-passing yards mark and throwing 50 touchdowns, making him just one of eight NCAA quarterbacks to ever throw 50 touchdowns in a single season. Dwayne, Jr.'s college performance earned him first-team All-Big Ten honors, in addition to six Big Ten Offensive Player of the Week awards, the Graham-George Offensive Player of the Year, the Griese-Breese Quarterback of the Year, and the Male Ohio State Athlete of the Year awards. He was also named as a semifinalist for the Maxwell Award and finished third in the Heisman Trophy voting.

3. The Haskins Family is a very close-knit family. I am a financial advisor and former CPA accountant. My husband, Dwayne, Sr., is a marketing and promotions consultant. Dwayne, Jr. and his sister, Tamia Haskins, were our only two children. The family gave Dwayne, Jr. the nickname "Simba" when he was a child, taken from the protagonist young lion in the film, "The Lion King."

4. Having grown up in a very spiritual family in Highland Park, New Jersey, and Gaithersburg, Maryland, Dwayne, Jr. was a devout Christian and often expressed the importance of his faith as being a major part of his athletic success.

5. On April 9, 2022, en route to traveling back home to the Pittsburgh, Pennsylvania area from South Florida, where he was training with several of his Pittsburgh Steelers teammates, Dwayne, Jr. was struck and killed by a truck on

Interstate 595 near Ft. Lauderdale, Florida. He was 24 years old at the time of his death.

6. Unbeknownst to our family, Dwayne, Jr. and Defendant, Kalabrya Haskins, were married on March 19, 2021, which was a little more than a year prior to his death in April 2022. My husband and I had never met the Defendant before she married Dwayne, Jr. We do know that she was not in his life prior to 2020.

7. Ever since the tragic death of Dwayne, Jr., our family has experienced constant harassment from the Defendant whenever we have attempted to reference Dwayne, Jr.'s name, image and likeness in public forums such as social media. For instance, the Defendant has contacted Instagram to have my husband's account and the account of our daughter, Tamia Haskins, disabled, as recently as May 2024.

8. Because the decision by Instagram to disable both accounts was clearly erroneous, our family is in the process of waging formal challenges to Instagram. According to Instagram, my husband's account was disabled because he created "an account that looks like it belongs to a celebrity." This decision was made despite the fact that he simply shares the same name as our famous son, but he has not otherwise posted any content on Instagram. Moreover, there are other persons who go by the name Dwayne Haskins on Instagram whose accounts have not been disabled.

9. In addition, the Defendant has challenged The Haskins Family's establishment of a non-profit foundation that goes by the name, Haskins Family Foundation Inc. Moreover, Defendant has contacted Instagram requesting that the Haskins Family Foundation Inc.'s Instagram account be disabled.

10. In light of these consistent acts of harassment by the Defendant, the Haskins Family, though our legal counsel, has contacted counsel for the Defendant by letter, dated June 6, 2024. The letter stated, in part:

It has come to our attention that your client, Kalabrya Haskins, has taken certain actions since the death of Dwayne Haskins, Jr. in April 2022 that have been intended to, and have had the effect of, undermining the rights of the Haskins Family to publicly reference the name, image and likeness of their beloved son and brother. We have received evidence that such actions have included, but are not limited to, improperly challenging the existence of the Haskins Family Foundation Inc., as well as formally requesting the disablement of the Instagram social media accounts of Dwayne Haskins, Sr., Tamia Haskins, and the Haskins Family Foundation Inc.

By this letter, and on behalf of the Haskins Family, we are demanding that you immediately cease and desist such improper conduct. We furthermore require that you provide us with written assurances by no later than Monday, June 10, 2024, that your client will no longer pursue the referenced **actions or any other such actions. You may provide the written assurances by return email.**

11. As of the date of this filing, Defendant's counsel has not provided the assurances requested by our counsel in the above-referenced letter.

**12. (THIS PARAGRAPH IS SUBJECT TO THE PLAINTIFFS'
ACCOMPANYING MOTION FOR *IN CAMERA* REVIEW BY THE JUDGE
AND THUS SHOULD NOT BE SEEN BY DEFENDANT OR HER
COUNSEL, OR OTHERWISE EXPOSED TO THE PUBLIC.)**

CONDUCT BY KALABRYA HASKINS

13. The Defendant has engaged in dishonest, aggressive and untrustworthy conduct that requires that our family request that the Court review our planned Project *in camera* and not share it with the Defendant or her counsel. This conduct has included the following:

- To this day, she refuses to provide an accurate accounting of Dwayne, Jr.'s assets that should be a part of the Estate.
- She has liquidated much of Dwayne, Jr.'s assets that should have been a part of the Estate.
- As the executor of Dwayne, Jr.'s estate, she failed to inform our family that Dwayne, Jr. made his sister, Tamia, the beneficiary of the Bradley Street Trust, which was his homestead at his death.
- She attempted to steal a very nice painting of Dwayne, Jr., which was created by a professional artist, and was displayed at his Bullis School Memorial Service and personalized with a note to his family; when she was told by the security guard who witnessed the attempted theft that she could not take the painting because it was specifically for Dwayne, Jr.'s family, she responded: "I hope they are going to get a lawyer because they're not going to get any money from us." (Declaration of Tyre Spinner, Ex. 1 to this Declaration, ¶ 2.)
- She has published at least one YouTube video in which she uses the image and likeness of Dwayne, Jr. to receive financial proceeds from ~~the public without placing the proceeds into Dwayne, Jr.'s Estate.~~
- She attempted to prevent Dwayne, Jr.'s family from getting a copy of their Marriage Certificate and Dwayne, Jr.'s Death Certificate.
- She promised to provide Dwayne, Jr.'s family with a portion of his ashes after she cremated him, without letting us know she had

planned to take this act, but she did not provide us with any portion of his ashes.

- She committed at least one physical assault against Dwayne, Jr. during their marriage.
- She issued a public threat to an NBA basketball player who was involved in an altercation with her sister.

I declare under penalty of perjury under the law of the Commonwealth of Pennsylvania that the foregoing is true and correct.

Signed on the 1st day of July, 2024

Montgomery County, Maryland

United States of America

Tamara Haskins

Tamara Haskins